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October 7, 2016

Federal Election Commission
Jeff S. Jordan, Assistant General Counsel
Office of Complaint Examination
and Legal Administration
999 E. Street, NW
Washington, DC 20463

Re: MUR 7131

Dear Mr. Jordan:

We write as counsel to the DCCC and Kelly Ward in her official capacity as Treasurer, in response to a complaint filed by Brian T. Griset on September 1, 2016 (the "Complaint"). The Complaint presents no conduct by the DCCC that could be construed to violate the Act, and accordingly, the Federal Election Commission ("FEC" or "Commission") should dismiss this matter with respect to the DCCC immediately.

The Complaint charges that another political committee, Senior Votes Count ("SVC"), coordinated with Congresswoman Carol Shea-Porter and her staff to produce a radio advertisement on October 29, 2014, in support of the Congresswoman's reelection campaign. The Complaint includes additional frivolous allegations against these committees, including claims of inaccurate reports, reporting delays, and excessive contributions. While there does not appear to be a basis for any of these allegations, regardless of their validity, the Complaint contains no actual allegation that the DCCC violated any law, or specifically, any provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), or Commission regulations.

The Complaint's sole substantive reference to the DCCC is to note one expenditure made by the DCCC on October 30, 2014, for the purpose of "media production" for "US House District 01." See Compl. at 5. This expenditure had nothing at all to do with any activity undertaken by SVC. In fact, the DCCC's independent expenditure of \$355 to Murphy Vogel Askew Reilly, LLC, for the purpose of "media production" for "US House District 01" on October 30, 2014 was actually for shipping costs associated with one of the DCCC's own television advertisements.¹ The Complaint fails to present any additional facts in connection with the DCCC.²

¹ See Exhibit A.

² The Complaint notes that the DCCC receives estimated contributions through ActBlue and supported Representative Shea-Porter's campaign in 2014, neither of which are relevant to the SVC advertisement. See Compl. at 24-25.

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Because the Complaint presents no fact that, even if true, would amount to a violation of the law by the DCCC, and because its claim against the DCCC is wholly speculative and refuted by actual evidence, the Commission should conclude that “the complaint does not meet the threshold for finding reason to believe” any violation occurred and immediately dismiss the DCCC from this matter.⁵

Very truly yours,

³ **Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith and Scott E. Thomas, Matter Under Review 4960 (Clinton for U.S. Exploratory Committee) (Dec. 21, 2000).**

⁴ *Id.*

⁵ First General Counsel's Report, Matter Under Review 5304 (Cardoza for Congress) (Jan. 21, 2004), at 9; *see also* Statement of Reasons, Matter Under Review 4960, *supra* note 3.

Exhibit A

18047474081

Invoice

Date	Invoice #
10/29/2014	D3C-476-14b

Bill To

Democratic Congressional Committee

D3C14-NH01-T01H-FINAL

Terms
Due on receipt

Description	Amount
Spot Delivery to Stations - "Failure"	355.00
Total	\$355.00

18044446971

Invoice

Date	Invoice #
10/7/2014	D3C-476-14

Terms
Due on receipt

[illegible]